

## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

LAJAMALE HORTON

Case: 2:22-mj-30393

Assigned To : Unassigned

Assign. Date : 9/14/2022

Case No. Description: RE: SEALED MATTER  
(EOB)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 14, 2022 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. § 922(g)

Felon in Possession of a Firearm

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.Sworn to before me and signed in my presence  
and/or by reliable electronic means.Date: September 14, 2022City and state: Detroit, MI*Complainant's signature*

Special Agent Neil Gavin

*Printed name and title**Judge's signature*

David R. Grand, U.S. Magistrate Judge

*Printed name and title*

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Neil Gavin, having been duly sworn, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigations and have been since 2004. I am currently assigned to the Detroit Violent Gang Task Force (VGTF) and tasked with investigating violent street gangs involved in violations of federal law, primarily narcotics trafficking, weapons violations and acts of violence. Prior to my current assignment I was assigned to the Kansas City FBI, where I investigated similar violations including narcotics trafficking and violent crime.

2. This affidavit is being submitted in support of a criminal complaint alleging that LAJAMALE HORTON has violated 18 U.S.C. § 922(g) (Felon in Possession of a Firearm). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging HORTON with the above listed violation, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe the defendant committed the offense alleged in the complaint.

3. This affidavit is based on my personal knowledge as well as information provided to me by other law enforcement agents and witnesses.

4. On September 14, 2022 the FBI Violent Gang Task Force executed a search warrant at 5967 Marseilles, Detroit, Michigan. The search warrant was reviewed and approved by the Honorable Judge David R. Grand in the Eastern District of Michigan. During the execution of the search warrant, HORTON was the sole individual present in the residence. VGTF recovered the following items from the residence:

- a Glock 9mm pistol, bearing serial number BFM932, fitted with a full-automatic switch
- 16 (sixteen) 9mm rounds loaded in the above pistol
- Three 9mm pistol magazines
- One 7.62 mm rifle magazine
- One 5.56 mm rifle magazine
- Various ammunition, including 7.62 mm, .380 and 9mm caliber

5. The Glock pistol was found in a bedroom in the residence where HORTON's driver's license and credit cards were located. In addition, there were several prescription pill bottles with HORTON's name on them found in the same room.

6. The Glock pistol also appeared to have been outfitted with a "full auto switch," which based upon my training and experience, I know is a device that is a part, or combination of parts, designed and intended for use in converting a

semiautomatic Glock pistol into a weapon that shoots automatically more than one shot, without manual reloading, by a single function of the trigger.

7. HORTON has been previously convicted of felonies, that is, crimes punishable by a term of imprisonment of more than one year. Specifically:


- 2012 – Third Circuit Court, Wayne County, Michigan – Felony Dangerous Weapon, Carrying with Unlawful Intent and Felony Firearm
- 2012 – Third Circuit Court, Wayne County, Michigan– Felony Carrying Concealed Weapon
- 2014 – Third Circuit Court, Wayne County, Michigan – Felony Firearm. HORTON was sentenced to and served two years of imprisonment for this conviction.

8. Due to his three prior felony convictions, HORTON is prohibited from possessing a firearm, in violation of 18 U.S.C. § 922(g)(1), Felon in Possession of a Firearm.

9. On September 14, 2022, I contacted Alcohol Tobacco and Firearms Special Agent Michael Jacobs, an Interstate Nexus Special Agent, and advised him of the seizure of the 9 mm caliber Glock firearm. Special Agent Jacobs was provided with a verbal description of the Glock firearm. Special Agent Jacobs, based on his training and experience, advised me that the firearm meets the federal

definition of a firearm and was manufactured outside the state of Michigan, and therefore, had traveled and affected interstate commerce.

10. Based on the facts set above, I believe that probable cause exists to believe LAJAMALE HORTON knowingly possessed a firearm, having been previously convicted of a crime punishable by more than one year of imprisonment, in violation of 18 U.S.C. § 922(g) and that the illegal possession of the firearm occurred in the Eastern District of Michigan.

  
\_\_\_\_\_  
Neil Gavin  
Special Agent  
Federal Bureau of Investigation

Subscribed and sworn by  
reliable electronic means this 14th day of September 2022

  
\_\_\_\_\_  
Honorable David R. Grand United States Magistrate Judge